

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:)	
TERESA WILLSON SNOW,)	Case No. 15-10438-R
)	(Chapter 13)
)	
Debtor.)	

APPLICATION TO WITHDRAW AS ATTORNEY FOR DEBTOR

Richard A. Chapman, Movant and attorney of record for the above-named debtor, respectfully files his application to withdraw. In support of this application, Movant states the following:

1. Local Rule 9010(D) states in pertinent part:

Withdrawal. An attorney shall be permitted to withdraw from a case or a proceeding, or both, only upon leave of Court. A request to withdraw shall state the reason therefor, the current status of the case including the pendency of any hearings, and whether substitute counsel has been obtained by the client. The request shall be served upon the client and other parties-in-interest. Withdrawal may be conditioned upon such terms as the Court may require.

L.R. 9010(D).

2. Debtor has asked Movant to withdraw.
3. The Fourth Continued Hearing (i.e., 5th Hearing) on the Trustee's Motion to Dismiss and Debtor's Response thereto, and the Third Confirmation Hearing is scheduled for hearing on Wednesday, October 21st, 2015, at 2:30 p.m., in Courtroom No. 1 of the Bankruptcy Court located at 224 South Boulder Avenue, downtown Tulsa, Oklahoma 74103.
4. The undersigned believes that debtor's Corrected First Amended Chapter 13 Plan filed August 15th, 2015 (Document 26) is ready for confirmation if the Trustee's

Motion to Dismiss, and Objection to Confirmation (Document 28) are otherwise taken care of. (*See also*, Document 27, Notice of No Adverse Effect). To date, Local Form 3015 is not filed.

5. Debtor is aware of the hearing date of October 21st, 2015, at 2:30 p.m., and what she must do in order to obtain a successful confirmation of her plan (i.e., address both the Trustee's Motion to Dismiss and satisfy the Trustee's Objection to Confirmation—mainly Paragraph 2).
6. To date, an Order Granting Nationstar Mortgage LLC's Motion for Relief (i.e., Document 27) has not yet been submitted to the Court for its approval, but one is supposed to be submitted on, or before October 17th, 2015. Document 38.
7. The undersigned is not aware whether or not debtor will obtain substitute counsel.
8. In compliance with L.R. 9010(D), the undersigned will obey and adhere to any other conditions the Court may place on the granting of this motion including Notice of Opportunity for Hearing if the Court so orders.
9. The undersigned will of course continue to represent debtor to the best of his ability until allowed to withdraw.

WHEREFORE, in compliance with Rule 1.16(a)(3) of the Oklahoma Rules of Professional Conduct, Richard A. Chapman prays that the Court allow him to withdraw, and for any other relief the Court deems just and equitable.

Dated: October 14, 2015.

Respectfully submitted,
RICHARD A. CHAPMAN, P.C.
s/Richard A. Chapman
Richard A. Chapman, O.B.A. # 17849
1612 S. Cincinnati Ave., Ste. 210

Tulsa, Oklahoma 74119
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Fax (918) 392-5646
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Attorney for Debtor

CERTIFICATE OF MAILING

I certify that on October 14, 2015, I mailed a true and correct copy of the foregoing instrument first class, via the U.S. Postal Service, proper postage attached thereto, to:

Teresa Willson Snow
4053 East 47th Pl.
Tulsa, OK 74135

CERTIFICATE OF ELECTRONIC SERVICE

I further certify that on the same date as this motion was filed, a true and correct copy of the instrument was sent to the following persons via the Court's Electronic Notice System:

Lonnie D. Eck, Chapter 13 Trustee
PO Box 2038
Tulsa, OK 74101-2038

Kelly M. Parker, Esq.
Lamun Mock Cunnyingham & Davis, P.C.
5613 N. Classen Blvd.
Oklahoma City, OK 73118

Danny C. Williams, United States Attorney
R. Samuel Boughner, Asst. U.S. Attorney
210 W. Park Avenue, Ste. 400
Oklahoma City, OK 73102

U.S. Trustee's Office
224 South Boulder Ave., Rm 225
Tulsa, OK 74103

s/Richard Chapman
Richard Chapman